

Measurement of emissions at very low levels (quantities or concentrations)

Issue: Measurements taken may return results with limit of detection levels greater than applicable regulatory thresholds or source specific emission limits. This situation may occur during an initial attempt by a source doing an applicability determination (thresholds) or subsequent compliance demonstrations (limit and/or inventory). Problems with identifying appropriate test method and procedures may occur if source does not confirm appropriateness with program staff prior to undertaking the test. Authority to require test is present in NR 439, however is not detailed with respect to the hundreds of HAPs listed in NR 438 and 445.

Note: There is an inherent up front presumption that the source being tested is one capable of emitting the hazardous compound of concern.

Possible approach:

